

**IN THE UNITED STATE DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION**

**UNITED STATES OF AMERICA**

§  
§  
§  
§

**v.**

**CRIMINAL NO. 1:23-CR-10**

**AHMED ALLAM**

§  
§

**MOTION TO APPEAL INFORMA PAUPERIS**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, Ryan W. Gertz and Thomas W. Kelley, Trial Counsel for Ahmed Allam, (“Mr. Allam”), one of the Defendants in the above styled and numbered cause, and files this Motion to Proceed Informa Pauperis and would show unto the Court as follows:

I.

Undersigned counsel was retained to represent Mr. Allam and entered appearance of counsel on February 1, 2023. Mr. Allam appeared, with counsel, before United States District Judge Marcia A. Crone for a change of plea hearing and plead guilty to Count 1 of the Indictment without a Plea Agreement. United States District Judge Marcia A. Crone accepted the defendant’s guilty plea and sentenced him on January 30, 2024 to federal prison. Mr. Allam, contemporaneous with this filing, is filing a Notice of Appeal and requesting the court to appoint him an attorney on appeal.

II.

Mr. Allam filled out the Financial Affidavit declaring that he is now indigent and requests the Court now appoint counsel to represent Mr. Allam on appeal. (*See*, attached Exhibit A).

WHEREFORE, PREMISES CONSIDERED, Counsel for Mr. Allam prays that the Court schedule a hearing on this matter and to appoint a public defender to represent Mr. Allam on appeal.

Respectfully submitted,

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*/s/ Ryan W. Gertz  
/s/ Thomas W. Kelley*

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RYAN W. GERTZ  
STATE BAR NUMBER: 24048489  
THOMAS W. KELLEY  
STATE BAR NUMBER: 24072891  
Attorneys for Ahmed Abdalla Allam

**CERTIFICATE OF SERVICE**

This is to certify that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on this the 1<sup>st</sup> day of February, 2024.

*/s/ Ryan W. Gertz  
/s/ Thomas W. Kelley*

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RYAN W. GERTZ  
THOMAS W. KELLEY